



**BUREAU OF INDIAN AFFAIRS  
US DEPARTMENT OF THE INTERIOR**

**DIVISION OF ENVIRONMENTAL AND CULTURAL  
RESOURCES MANAGEMENT  
WASHINGTON, DC**

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***Environmental Management System – Summary Sheet***

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***Background – Environmental Management Systems***

An “Environmental Management System” is a management approach that formally integrates environmental considerations into day-to-day decisions and practices. An EMS is part of a facility’s overall management system, similar to personnel and financial management systems. An EMS provides a proactive approach to environmental management that emphasizes efficiency and continuous improvement instead of reactive crisis management. Investing in an EMS can provide benefits that yield tangible returns such as:

- Reducing legal, environmental, and human risk, and diminishing liability;
- Identifying and reducing environmental impacts, which make operations more efficient and less wasteful; and
- Fostering more positive relationships with employees, the public, and regulators, by demonstrating a commitment to improving environmental performance and going beyond regulatory compliance.

A formal EMS includes elements such as policy, performance goals and objectives, designated roles and responsibilities, allocation of resources, institution of documented procedures, and measurement of performance. An EMS provides a framework for managing environmental responsibilities, including regulatory compliance.

***Government Mandate Related to Environmental Management Systems***

Executive Order 13148, Greening the Government Through Leadership in Environmental Management, mandates that Federal agencies integrate EMSs into their organizations. Key EO requirements are summarized below:

- Requires Federal agencies, including the BIA, to implement an environmental management system by 2005 at all applicable facilities.
- Directs agencies, including the BIA, to establish and implement environmental compliance audit programs and policies that emphasize pollution prevention.
- Requires agencies, including the BIA, to pilot life cycle assessment and environmental cost accounting concepts in their operations.
- Establishes an awards program to recognize environmental leadership practices.
- Contains numerous procurement-related provisions to achieve reductions in the use and release of toxic chemicals.

***Is EMS Valuable for the BIA?***

Asking a few questions is valuable in determining if EMS is important for the BIA:

- Is there a formal commitment to protecting the environment within the BIA? Do agency staff understand this commitment?
- Are there goals set to improve environmental performance for agencies?
- Are environmental responsibilities clearly defined?
- Are environmental training requirements for BIA personnel understood? Are all staff appropriately trained?
- Are environmental projects accounted for in the BIA budgets? Does everyone understand this process?

- Are Agency-level procedures for managing environmental issues documented so that staff know what they should be doing?

The concept of an EMS is not new for the BIA. The BIA has existing systems for managing environmental issues at all levels of the organization. These activities stem from those managed through the Central Office Division of Environmental and Cultural Resource Protection (DECRM) and other Central Office operations with environmental considerations, to regional programs administered by the Regional Environmental Scientists and others, and to Agency and school programs that address day-to-day environmental concerns. However, these programs are not always formalized or complete. By formalizing the EMS and addressing gaps, the BIA may be able to operate more efficiently while improving their management of trust responsibilities.

#### ***Development and Implementation of an EMS***

To develop an EMS, the workgroup will review what elements of their EMS should be developed, from the Bureau level to the facility level. Steps that may be taken to establish the BIA EMS include:

- Developing an environmental policy that states the BIA's commitment to the environment. This policy will establish goals that the EMS will be evaluated against. This policy will also be used as the base of a framework for planning and action and will be developed and tailored for all levels.
- Developing guidance that assists in implementation of programs designed to meet the environmental policy. Guidance could include sample plans, programs, gap analysis, and communication media that will assist in following in the Bureau's policy.
- Implementing model EMSs through pilots. The pilots will involve site visits and coaching on the development of a documented EMS at the selected locations. A key aspect to these projects is the development and testing of a system that is simple, focused on education and assistance, and that can accommodate the complexities of BIA management.
- Identifying structure and responsibility. Roles and responsibilities will be established for environmental management and provide appropriate resources.
- Ensuring that staff will be trained and capable of carrying out their environmental responsibilities.
- Maintaining information on the Bureau's EMS and related documents at all levels.
- Monitoring and measuring key activities and tracking performance. Periodic assessments will be conducted for regulatory compliance and review of EMS for continual improvement.

#### ***Timeline***

As mentioned earlier, the BIA may have already implemented several elements of an EMS. This may be in the form of standard operating procedures at the facility level, regulatory compliance audits at the agency level, or policies on solid waste reduction and green procurement at the Bureau level. An EMS will consolidate all current environmental management activities with those developed by the workgroup. Based on the EO, the BIA intends to have the EMS framework installed at all applicable facilities by December 31, 2005.

#### ***Conclusions***

A successful Bureau-wide EMS will result in all of these elements in place at all BIA facilities at all levels. The EMS will provide a proactive approach to environmental management that will result in improved efficiency and continuous improvement. For an EMS to be successful, input from all levels is needed to ensure that EMS goals and policies are realistic for implementation.